

EXHIBIT J

From: simonetttil@gtlaw.com <simonetttil@gtlaw.com>

Sent: Saturday, September 3, 2022 8:46 AM

To: anthony@fiorentinolaw.net

Cc: carlo@sabatinilawfirm.com; Dan Edelman <dedelman@edcombs.com>; Carly Roman <croman@edcombs.com>; Cassandra Miller <cmiller@edcombs.com>; allenmayed@gtlaw.com; mairc@gtlaw.com; bookhardts@gtlaw.com

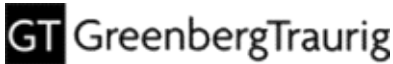
Subject: RE: Feasibility Assessment of Class Definitions

NSL does not have an obligation to undertake feasibility assessments for proposed class definitions. Plaintiffs bear the burden of establishing the Rule 23 requirements. If the motion is granted, NSL will deal with certification issues in the ordinary course.

Lisa Simonetti

Shareholder

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From: Anthony Fiorentino <anthony@fiorentinolaw.net>

Sent: Saturday, September 3, 2022 9:32 AM

To: Simonetti, Lisa (Shld-LA-LT) <simonetttil@gtlaw.com>

Cc: carlo@sabatinilawfirm.com; dedelman@edcombs.com; croman@edcombs.com; cmiller@edcombs.com; Allen-Maye, Desiree (Para-LA-LT) <allenmayed@gtlaw.com>; Mair, Christopher (Assoc-CHI-LT) <mairc@gtlaw.com>; Bookhardt, Samuel (Assoc-FTL-LT) <bookhardts@gtlaw.com>

Subject: Re: Feasibility Assessment of Class Definitions

Lisa,

Is your client willing to provide a feasibility assessment for the two classes that Defendants conceded are within the scope of the complaint? It would help to have that information now, since it's not contingent on amending the complaint.

Tony

On Sep 3, 2022, at 8:23 AM, Anthony Fiorentino <anthony@fiorentinolaw.net> wrote:

Thanks. Could they provide the templates next week?

On Sep 3, 2022, at 8:13 AM, simonettil@gtlaw.com wrote:

NSL did look into this. Emails are not stored at the account level, but templates are generally available. They are pulling.

Lisa Simonetti
Shareholder

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From: Anthony Fiorentino <anthony@fiorentinolaw.net>
Sent: Friday, September 2, 2022 4:13 PM
To: Simonetti, Lisa (Shld-LA-LT) <simonettil@gtlaw.com>
Cc: carlo@sabatinilawfirm.com; Dan Edelman <dedelman@edcombs.com>; Carly Roman <croman@edcombs.com>; Cassandra Miller <cmiller@edcombs.com>
Subject: Re: Feasibility Assessment of Class Definitions

EXTERNAL TO GT

Lisa,

I would also like to renew our request for copies of all e-correspondence that Navient sent to Plaintiffs, including any emails or e-notices involving their IDR plans. We still have not received copies of any emails from Navient to Plaintiffs. These items were requested in our initial discovery requests. If you could produce those next week, it would be appreciated.

Have a nice holiday weekend.

Tony Fiorentino
Fiorentino Law Offices
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Chicago, IL 60654

From: Anthony Fiorentino
Sent: Friday, September 2, 2022 2:34 PM
To: simonettil@gtlaw.com <simonettil@gtlaw.com>
Cc: carlo@sabatinilawfirm.com <carlo@sabatinilawfirm.com>; Dan Edelman <dedelman@edcombs.com>; Carly Roman <croman@edcombs.com>; Cassandra Miller <cmiller@edcombs.com>
Subject: Feasibility Assessment of Class Definitions

Lisa,

As you are aware, Plaintiffs previously served on Defendants a set of six proposed class definitions, requesting that Navient advise Plaintiffs as to the feasibility of running computer searches of the classes to determine the number of members in each class. Defendants objected to the request and have not yet done so.

As per our meeting with the judge this morning, we are currently drafting an amended complaint, which will be filed with a motion to amend the complaint and compel class discovery. In anticipation of our motion, we would like to renew our request that Navient provide a brief assessment as to the feasibility of the six proposed class definitions.

Please note, we are aware of your concern that prematurely executing the searches would be unduly burdensome. Accordingly, we are not asking that the searches be run at this time. We are only requesting a brief assessment from Navient's IT department indicating which classes can be feasibly searched, which cannot, and the reasons why any classes are not searchable. The execution of searches can await a ruling on our motion.

If there is some technical reason that the new proposed definitions cannot be searched, it would make sense for that issue to be addressed before we move to amend the complaint. We would like to ensure that the amended complaint only

includes definitions that are workable, so that we do not learn of the problem later, and then have to seek leave to file yet another amended complaint.

Obviously, the feasibility assessment would be subject to, and without waiving, Defendants' pending objections to the class definitions.

For your convenience, the proposed class definitions have been attached to this email, along with my prior memo regarding the definitions.

Given our filing deadline of September 23rd, we would appreciate it if Defendants could provide the assessment no later than September 12th. Please advise if this can be done.

Also, pursuant to L.R. 7.1, please confirm whether Defendants concur with Plaintiffs' motion to amend the complaint and compel class discovery.

Tony Fiorentino
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